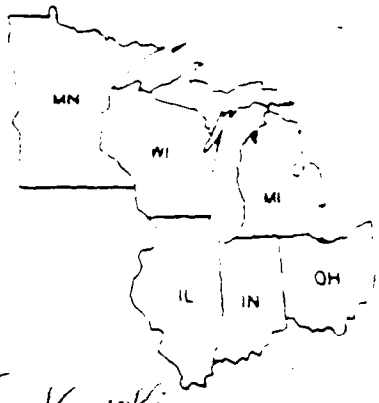
United States Environmental Protection Agency
Region V
77 West Jackson Boulevard
Chicago, Illinois 60604

EPA



Superfund Division

Facsimile Cover Sheet
Telephone Number
312- 353-8426

To: John Vranicar ~~X~~ Andy Jankowski

Office phone: 312-782-7781 **Machine No:** 312-263-0939

217-785-6020 217-557-1165

From: Craig Thomas

Office phone: 312-886-5907 **Mail code:** SRF-5J

Date: 6/13/02 **Number of pages, including cover:** 4 w/Cover

Message: Section 9.2 of the Ft Dearborn QAPP.

The second ¶ indicates Harza will do data validation on 10% of the data.

The third paragraph indicates they will conduct a systematic review of data on 10%

10% + 10% ≠ 100%

Signature: Craig

rument output in either tabular or graphic form is retained on file indefinitely in the laboratory. In those cases where the instrument data system generates a computer data file, that file is also retained.

In general, computer files generated by an instrumental data system will save those files on a high capacity hard drive. Internal procedures are in place for transfer of these files to diskettes or tape to guard against data loss because of hard drive failure and to keep an adequate portion of the drive available for new data acquisition. These backup procedures are carried out on a weekly basis as a minimum and more frequently when sample throughput on a given instrument system is high.

9.2 DATA REVIEW

ARDL will perform a 100% internal data review of its data and submit this in the case narrative with the analytical data package.

Harza will perform data validation of the analytical data package submitted by the contract lab using the USEPA National Functional Guidelines for Organic (Inorganic) Data Review (USEPA, 1994a, 1994b) and QC acceptance criteria from SW-846. Harza will perform validation on 10% of the total data. Data selected as part of the 10% to be validated by Harza will be selected to ensure that all matrices and analytical methods are represented. The 10% number is a minimum and actual samples validated may exceed 10% of the total data. A Data Validation Report will be prepared by Harza that will follow the format specified in the USEPA Region V Model Quality Assurance Project Plan. In addition to Harza's Data Validation an independent third party contractor will also validate 10% of the data. The validation firm will be Lee A. Knupple and Associates, Inc., 7770 Cooper Road, Montgomery, Ohio, 45242, tel. 513-793-4222. All manually integrated peaks will be validated. Analytical deficiencies found during the validation of data can cause all data for a particular analytical method to be qualified and sometimes lead to the rejection of the data. If a deficiency is noted, 100% validation for that particular matrix or analytical test will be required. A validation report addressing the findings will be generated.

Harza will conduct a systematic review of the data for compliance with the established QC criteria on 10% of the data submitted by the lab. The data validation qualifiers are listed in Table 9-1 and the project acceptance criteria are listed in Tables 9-2 through 9-9. The criteria to be checked will include:

- Case Narrative/Data Package Identification
- Chain-of-Custody and Cooler Receipt Forms
- Cooler Receipt Forms
- Lab Sample Identification
- Contract Sample Identification, if different
- Sample Results by Sample and Analytical Fraction
- Analytical Method Performed
- Analytical Reporting Limits
- Lab Data Qualifiers
- Holding Times
- Surrogate Recoveries
- Lab Control Sample Recoveries (LCS/LCSD)
- MS/MSD Recoveries
- Method Blank Results
- Laboratory Duplicate Results
- Field Blank Results
- Instrument Performance and Calibration
- Correct Qualitative and Quantitative Interpretation of Raw Data
- Manually Integrated Peaks, all will be validated and identified in the case narrative

The data reviewer will identify any out-of-control data points and data omissions and interact with the laboratory to correct data deficiencies. Decisions to repeat sample collection and analyses may be made by the project manager based on the extent of the deficiencies and their importance in the overall context of the project.

The data reviewer comments will indicate that the data are 1) usable as a quantitative concentration, 2) usable with caution as an estimated concentration, or 3) unusable due to out-of-control QC results.

As part of this review a Data Validation Report will be prepared. The report will address the overall conformance of reported data with the quality control objectives of the project. The typical matters discussed in the report will be the performance of both laboratory and sampling personnel. Laboratory performance will evaluated on such matters as: 1) meeting holding times; 2) preparing acceptable method blanks; 3) meeting requirements for surrogate recoveries; 4) achieving acceptable analytical accuracy as indicated by recoveries in MS/MSD and LCS preparations; and 5) achieving acceptable

analytical precision as indicated by agreement of results for MS/MSD pairs and laboratory duplicates. Sampling team performance will be evaluated on such matters as: 1) conformance to sampling protocol as indicated by collection of rinsate blanks of acceptable quality; 2) adherence to sampling schedules; and 3) correctness in observing sampling documentation requirements. The Data Validation report will include statements relative to the overall quality of the data collected to date and the current level of conformance to project data quality objectives.

Data review will be conducted on the data that does not go through the data validation process. The following items will be reviewed:

- Review of chain-of-custody forms to verify that samples were collected in accordance with the QAPP, appropriate analyses were requested from the laboratory, and that the laboratory received all samples.
- Review sample collection and analysis dates to verify that samples were analyzed within the specified holding times.
- Review chain-of-custody forms and summary of analytical data to verify that all required analyses were completed.
- Review laboratory case narratives to identify potential data quality problems.
- Review laboratory case narratives to identify manually integrated data.
- Surrogate, LCS, MS/MSD Recoveries
- Blank Results
- Calibration & Tunes (in so far as, that they were performed at the appropriate frequencies)

Results of the data review will be incorporated into the Data Validation report.

9.3 DATA REPORTING

Additionally, data reporting procedures shall be carried out for field and laboratory operations as indicated below:

9.3.1 Field Data Reporting

Field data reporting shall be conducted principally through the transmission of report sheets containing tabulated results of all measurements made in the field, and documentation of all field calibration activities.

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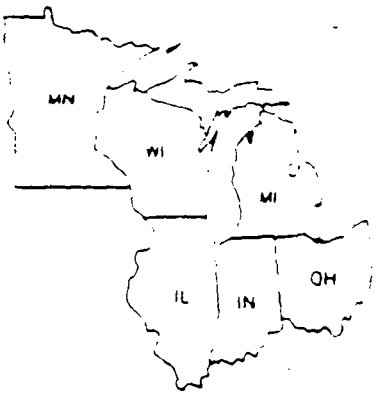

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Date: 6/12/02 **Number of pages, including cover:** 2

Message: John,

Here's the relevant comment page. It's the response to comment 11. Please not that the language in this response WAS included verbatim into Section 9.2 of the QAPP

Signature: Craig